

Mr. Thomas Lund
United States Mineral Products Company
d/b/a Isolatek International
P.O. Box 5006
Huntington, IN 46750

Re: **069-11828**
First Administrative Amendment to
Part 70 T 069-5660-00021

Dear Mr. Lund:

United States Mineral Products Company - d/b/a Isolatek International, was issued a permit on December 28, 1999 for a stationary acoustic and thermal insulation manufacturing source. A letter requesting a change of the source mailing address, clarifications of Conditions D.1.9(b)(3) and D.2.4 of the permit and changes in the TSD Addendum and TSD was received on January 31, 2000. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**. Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows:

1. The source has requested that the mailing address be changed to P.O. Box 5006.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary acoustic and thermal insulation manufacturing source.

Responsible Official: Thomas Lund
Source Address: 701 North Broadway, Huntington, Indiana 46750
Mailing Address: ~~701 North Broadway~~ **P.O. Box 5006**, Huntington, Indiana 46750

2. The source requested clarification of the term "work purchases practices" in Condition D.1.9(b)(3) or "work purchases orders."

Condition D.1.9(b)(3) states, "Operation and preventive maintenance logs, including work purchases orders, shall be maintained." A "work purchase order" can be interpreted to mean, but not limited to, a purchase order for a replacement part or spare parts as well as a work order for in-house maintenance or contracted work. However, the terms "work purchases practices" did not appear in the issued permit nor in the TSD Addendum. Therefore, no change is required to Condition D.1.9 of the issued permit.

3. The wording in Condition D.2.4 has been clarified to reference all of the facilities in Section D.2.

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test ~~this~~ **these** ~~facilityies~~ by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if ~~these~~ **these** ~~facilityies~~ **is are** in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

The following are for clarification only, and did not change the permit. OAM does not revise the Technical Support Documents. All changes necessary are documented in the Addendum to the Technical Support Document.

4. The million British thermal units per hour ratings for the cupolas were removed from the description in the equipment list in the permit prior to public notice as agreed upon, but were not removed in the original TSD. Thus, although the permit was correct as issued, the wording from the TSD is shown below with this deletion prior to the change document in the Addendum in Responses 2 -8.
 - (a) Two (2) short Stack # 1 and # 2 cupolas, known as EU#1 and EU#2, ~~each rated at 27.0 million British thermal units per hour~~, each equipped with a baghouse, known as CE#1 and CE#2, installed before 1960, exhausted to Stack #1 and Stack #2, respectively, capacity: 7.2 tons of molten material per hour, each.
5. The original TSD required PM testing of the blowchamber which was eliminated for cause. The TSD Addendum in Responses 2 - 8 addressed this issue and the permit was revised to eliminate the testing requirement for the blowchamber. The original TSD does not change after the issuance of the TSD Addendum. Since the permit was correct as issued, no change is required to Condition D.1.3(b).
6. The original TSD required sulfur dioxide emission limitations and compliance monitoring for the two (2) cupolas. Response 11 of the TSD Addendum deleted these requirements from the permit. The original TSD does not change after the issuance of the TSD Addendum. Since the permit was correct as issued, no change is required to the issued permit.
7. The TSD Appendix A revised spreadsheets have been updated and attached so that the sum of the potential to emit after controls in the comparison to allowable PM emission rates on Page 1 of 8. This change does not affect the statements in TSD Addendum or any of the conditions in the issued permit.
8. The capacity of EU#29 was correct in the issued permit, but the correction was not shown in the TSD Addendum. The change implemented by the TSD Addendum should have stated that the capacity was 216 tons of rock, slag and coke per hour as follows:
 - (t) One (1) raw material receiving yard, known as EU#29, installed prior to 1980, capacity: ~~90.0~~ 216 tons of rock, slag and coke per hour.

Therefore, no change to the issued permit is necessary.

9. Responses 2 - 8 of the TSD Addendum correctly identified that item (k) of Condition A.2 had their capacities increased from 0.2 to 0.75 tons per hour each for EU#25 and EU#26 for a total capacity increase of 1.10 tons per hour, not 27 tons per hour as indicated in the TSD Addendum table. Therefore, the TSD Addendum table has been updated as follows:

Emission Unit (EU #)	Capacity Increase (tons/hour)	PTE PM Increase Before Controls (tons/year)	PTE PM Increase After Controls (tons/year)	PTE PM₁₀ Increase Before Controls (tons/year)	PTE PM₁₀ Increase After Controls (tons/year)
25 & 26	27 1.10	0.482	0.482	0.482	0.482
9	27	63.9	0.639	63.9	0.639
10	27	63.9	0.639	63.9	0.639
11	27	31.9	0.320	31.9	0.320
29	126	1.35	1.35	0.640	0.640
Total Change		161.5	3.43	160.8	2.72

The changes in potential PM and PM₁₀ emissions were correctly calculated with the 1.10 tons per hour increase. Therefore, no changes in the issued permit are required.

10. For clarification, the source does not disagree with the estimated potential to emit from insignificant activities that were listed in the Technical Support Document. Therefore, no changes in the issued permit are required.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
MLK/MES

cc: File - Huntington County
U.S. EPA, Region V
Huntington County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**United States Mineral Products Company
d/b/a Isolatek International
701 North Broadway
Huntington, IN 46750**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 069-11828-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 28, 1999

First Administrative Amendment: AAT 069-11828	Pages Affected: 5 and 36
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary acoustic and thermal insulation manufacturing source.

Responsible Official: Thomas Lund
Source Address: 701 North Broadway, Huntington, Indiana 46750
Mailing Address: P.O. Box 5006, Huntington, Indiana 46750
SIC Code: 3296
County Location: Huntington
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) short stack # 1 and # 2 cupolas, known as EU#1 and EU#2, installed before 1960, each equipped with a baghouse, known as CE#1 and CE#2, exhausted to Stack #1 and Stack #2, respectively, capacity: 7.2 tons of molten material per hour, each.
- (b) Two (2) blowchambers, known as EU#3 and EU#4, installed before 1978, each equipped with a screenhouse, known as CE#3 and CE#4, (#1 and #2 screenhouse), capacity: 6.0 tons of fibers per hour, each.
- (c) Three (3) hoppers, known as EU#14, EU#15 and EU#17 (hopper #1, #2 and #4), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 5.0 tons of dry powdered binders per hour, each.
- (d) Two (2) hoppers, known as EU#16 and EU#18 (hopper #3 and #5), installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 0.2 ton of dry powdered binders per hour, each.
- (e) One (1) live bottom hopper, known as EU#19, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.
- (f) One (1) granulator, known as EU#20, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 8.0 tons of mineral wool per hour.
- (g) One (1) bagger, known as EU#21, installed in 1980, equipped with a baghouse, known as CE#9, exhausted to Stack #9, capacity: 12.0 tons of blended product per hour.

D.2.2 Prevention of Significant Deterioration [326 IAC 2-2]

Any change or modification for these emission units which may increase potential to emit to 25 tons per year for PM and 15 tons per year for PM₁₀ shall require approval from IDEM, OAM prior to making the change.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for facilities, EU#7 - EU#12, EU#14, EU#15, EU#17, EU#19 - EU#24 and EU#27, and their control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

The baghouses (CE#5 - CE#9) for PM control shall be in operation at all times when their facilities are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of emission units EU#7 - EU#12, EU#14, EU#15, EU#17, EU#19, EU#24 and EU#27 stack exhausts (Stack #5, #6, #7, #8 and #9) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses (CE#5 - CE#9) used in conjunction with emission units EU# 7, 8, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 27 and 28 at least once daily when the insulation manufacturing processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouses CE#5 and CE#6 shall be maintained within the range of 2.0 and 7.0 inches of water, the pressure drop across baghouses CE#7 and CE#8 shall be maintained within the range of 1.0 and 6.0 inches of water, and the pressure drop